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10 Attorney for Defendant
11 BACKGROUNDCHECKS.COM LLC
12

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 VALERIE MCKINNEY,

16 Plaintiff,

v.

17 EXPERIAN INFORMATION SOLUTIONS,
18 INC., TSC ACCOUNTS RECEIVABLE
19 SOLUTIONS and
20 BACKGROUNDCHECKS.COM LLC,

Defendants.

Case No. 2:22-cv-01354-GMN-VCF

21 **STIPULATION TO EXTEND TIME FOR**
22 **DEFENDANT**
23 **BACKGROUNDCHECKS.COM LLC TO**
24 **FILE RESPONSIVE PLEADING TO**
25 **PLAINTIFF'S COMPLAINT**

26 **[FIRST REQUEST]**

27 Plaintiff VALERIE MCKINNEY ("Plaintiff") and Defendant
28 BACKGROUNDCHECKS.COM LLC ("Defendant"), by and through their undersigned counsel,
hereby agree and stipulate to extend the time for Defendant to file a response to the Complaint from
the current deadline of December 27, 2022, up to and including **January 26, 2023**.

29 The requested extension is necessary in light of the fact that Defendant's counsel was recently
30 retained. The additional time will allow defense counsel to conduct a complete investigation into the
31 allegations and to prepare a response to the Complaint.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3 Dated: December 27, 2022

4 Dated: December 27, 2022

5 Respectfully submitted,

6 Respectfully submitted,

7 /s/ Michael Kind

8 MICHAEL KIND, ESQ.
KIND LAW

7 /s/ Diana G. Dickinson

8 DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

9 GEORGE HAINES, ESQ.

10 GERARDO AVALOS, ESQ.
FREEDOM LAW FIRM, LLC

9 *Attorney for Defendant*

10 BACKGROUNDCHECKS.COM LLC

11 *Attorneys for Plaintiff*

12 VALERIE MCKINNEY

13 **IT IS SO ORDERED.**

14 Dated: 1-11-2023



15 UNITED STATES MAGISTRATE JUDGE

16 4855-6693-9460.1 / 107811-1025